

To: Kane, Eleanor[kane.eleanor@epa.gov]; Downey, Shannon[downey.shannon@epa.gov]
Cc: Argentieri, Sabrina[argentieri.sabrina@epa.gov]
From: Marshall, Sarah
Sent: Tue 3/4/2014 4:35:57 PM
Subject: FW: Title V Request regarding material processing areas and emissions calculations
[ii08_feb2005.pdf](#)
[II08_march1998.pdf](#)

Sarah Marshall

Section Chief MI/WI Section

Air Enforcement and Compliance Assurance Branch

U.S. Environmental Protection Agency, Region 5

312-886-6797

From: Ogulei, David
Sent: Tuesday, March 04, 2014 10:30 AM
To: Hall, Charles; Marshall, Sarah; Downey, Shannon
Subject: FW: Title V Request regarding material processing areas and emissions calculations

Any specific concerns with Veolia's proposed VOC calculation methodology here? This method should generally be okay if we have relatively accurate information on the organic constituents in the tank headspace. It would also be subject to uncertainties in the estimates for mass transfer coefficients for each constituent. Not sure whether this method is superior to TANKS though.

From: Paddock, Nancy [<mailto:nancy.paddock@veolia.com>]
Sent: Tuesday, March 04, 2014 9:31 AM
To: Ogulei, David
Cc: Dennis Warchol; Damico, Genevieve
Subject: Re: Title V Request regarding material processing areas and emissions calculations

I am attaching the 1998 document as well as the 2005 version. The methodology in the 2005 document remains the same as the 1998 version, however, the reference number

for the equation is different. In the 1998 document we reference equation 8.4-18. In the 2005 document the equation is now 8.4-22.

Thank you.

Nancy

Nancy Paddock
Environmental Engineering Specialist
Veolia ES Technical Solutions, L.L.C.
7 Mobile Avenue
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Please note that my e-mail address has changed:

Nancy.Paddock@Veolia.com

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On Tue, Mar 4, 2014 at 8:41 AM, Ogulei, David <Ogulei.David@epa.gov> wrote:

Okay, no problem. First things first, could you send me an electronic copy of the March 1998 version of the EIIP Vol. II document to which you reference below? I couldn't immediately locate it.

David Ogulei

U.S. Environmental Protection Agency

Region 5 | Air & Radiation Division | A-18J

77 West Jackson Blvd. | Chicago, Illinois 60604

Phone: (312) 353-0987 | Fax: (312) 692-2080

Ogulei.David@epa.gov

From: Paddock, Nancy [mailto:nancy.paddock@veolia.com]

Sent: Tuesday, March 04, 2014 6:28 AM

To: Ogulei, David

Cc: Dennis Warchol

Subject: Re: Title V Request regarding material processing areas and emissions calculations

Yes, David, old habits die hard. We've been through many name changes but TWI was the original. I am in fact, referring to Veolia in my original e-mail message.

Please let me know if you need additional information regarding this request.

Thanks and have a great day!

Nancy

Nancy Paddock
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On Mon, Mar 3, 2014 at 4:28 PM, Ogulei, David <Ogulei.David@epa.gov> wrote:

Nancy,

The email below refers to "TWI" in multiple locations. I'm assuming you are referring to Veolia's permit and estimated emissions. If this request indeed pertains to Veolia, we will review the request as part of the renewal permit application.

Thank you.

David Ogulei

U.S. Environmental Protection Agency

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Ogulei.David@epa.gov

From: Paddock, Nancy [mailto:nancy.paddock@veolia.com]
Sent: Monday, March 03, 2014 1:43 PM
To: Ogulei, David
Cc: Dennis Warchol
Subject: Title V Request regarding material processing areas and emissions calculations

Hello David,

Section 2.2(E)(3) of TWI's 2008 Title V permit states that the TANKS program must be used to calculate emissions from MP1, MP2 and LPR.

Last year, a consultant reviewed our emissions inventory process. The Surface Evaporation Model from EPA Guidance EIIP Volume II:Chapter 8 Section 4.1.4. Preferred and Alternative Methods for Estimating Air Emissions from Paint and Ink Manufacturing Facilities, March 1998. Equation 8.4-18 was used to calculate emissions from MP1, MP2 and LPR. The consultant compiled an average of 5 years of the most recent TRI concentration data to determine the concentration of VOC and HAP in the waste, which was then used in the EPA Surface Evaporation Model referenced above.

TANKS is based on routine displacement of liquids. The surface evaporation model is based on the volatility and ability of a compound to evaporate from the surface of solids and then be picked up by the air in the building and carried to the atmosphere. The evaporation method seems to be more appropriate for MP1, MP2 and LPR; TWI would like to change section 2.2(E)(3) of the upcoming permit (or the equivalent section thereof) to indicate the Surface Evaporation Model will be used to calculate emissions from these sources.

This table compares emissions calculated by both methods for the same calendar year:

	TANKS Model		Evaporative model	
area	TPY	lb	TPY	lb
MP-1	0.06	117	0.21	424

MP-2	0.02	44	0.11	212
LABPACK/ REB ACK		68	0.04	85

I hope this makes sense. Please let me know if you have questions.

Thank you,

Nancy

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